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March 31, 2023

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to add David McNamara, the husband of Sandra Ann Crain, as an additional third-party custodian. The Court previously approved Ms. Crain, Danielle Goetsche and Victoria Landerman as third-party custodians. U.S. Pretrial Services Officer David Hernandez has approved Mr. McNamara as a suitable fourth third-party custodian. I have reviewed each of the terms of the bail conditions with Mr. McNamara. He understands and accepts his responsibilities as a third-party custodian.

Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Solano, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Matthew Menchel, Esq.
Carolina Leung, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)